

**UNITED STATES DISTRICT COURT**

MIDDLE DISTRICT OF ALABAMA  
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December 17, 2007

**NOTICE OF CORRECTION**

**From: Clerk's Office**

**Case Style: Jerry Leon Dees, Jr. Vs. Hyundai Motor Manufacturing AL**  
**Case Number: 2:07cv306-MHT**

**Pleading : #66 - Motion to Quash Subpoena**

**Notice of Correction is being filed this date to advise that the referenced pleading was e-filed on 12/7/07 with an incorrect party listed with in the body of the pleading.**

**The error has been corrected and the corrected pdf document is attached to this notice.**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

JERRY LEON DEES, JR. )  
 )  
 Plaintiff, )  
 )  
 v. ) CIVIL ACTION NO.: 2:07 cv306-MHT  
 )  
 HYUNDAI MOTOR )  
 MANUFACTURING ALABAMA )  
 LLC, )  
 )  
 Defendants. )


## MOTION TO QUASH SUBPOENA

COMES NOW a non-party Dr. Saeed A. Shah and moves this Honorable Court for an Order directing that the records and/or oral testimony of the non-party as they pertain to **JAMES A. BROOKSHIRE** remain confidential and this Honorable Court issue an Order quashing the subpoena served upon the Movant requesting medical/psychiatric records related to the foregoing individual and for grounds would show as follows:

1. That your movant is not a party to this action and is a mental health services provider.
2. That pursuant to Sec. 34-26-2, Code of Alabama, (1975); the Health Insurance Portability and Accountability Act of 1996, (HIPPA); and the psychotherapist privilege afforded by the United States Supreme Court to licensed psychiatrists in the case of Jaffe v. Redmond, 518 U.S. 1, 15, 135 L.Ed. 2d 337, 116 S.Ct. 1923 (1996), the records and/or testimony requested in this case contain

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Motion To Quash  
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information gathered pursuant to the assessment and treatment of  
**JAMES A. BROOKSHIRE** and is therefore confidential information  
and is not subject to disclosure.

  
\_\_\_\_\_  
Stephen B. Griffin  
Attorney for the Movant  
ASB-9998-F64S

OF COUNSEL:

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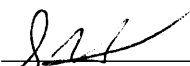
**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion has been served  
upon counsel of record by placing a copy of same in the United States Mail postage pre-  
paid this the 12<sup>th</sup> day of December 2007 properly addressed as follows:

cc:

Hon. Jeffrey R. Sport  
1810 Old Government Street  
Post Office Box 66710  
Mobile, AL 36660

Hon. Scott Kelley  
One Federal Place  
1819 8<sup>th</sup> Avenue North  
Suite 1000  
Birmingham, AL 35203-2118

  
\_\_\_\_\_  
Of Counsel